

1 I, Matthew A. Meyers, declare as follows:

2 1. I am an attorney licensed to practice law in the State of Pennsylvania, admitted to
3 the bar of the Western District of Pennsylvania, and one of the attorneys for the Defendants in
4 this Action.

5 2. In August 2007, I contacted six different blood testing facilities in California from
6 a list of blood testing facilities approved by OSHA to conduct Blood Lead Level ("BLL") Tests.

7 3. I obtained from each of these six blood testing facilities the cost information for
8 individual BLL Tests.

9 4. Based upon the information provided to me by the six blood testing facilities in
10 California, the average cost of a single BLL test is in excess of \$ 60 per BLL test.

11 I declare under penalty of perjury that the foregoing is true and correct. If called as a
12 witness herein, I could and would testify competently to the facts stated above. Executed this
13 20th day of November, 2007 in Pittsburgh, Pennsylvania.

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16 By: 
17 Matthew A. Meyers

18 Attorney for Defendants
19 Mattel, Inc. and Fisher-Price, Inc.
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